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 pursuant to 28 U.S.C. § 515  
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*Representing the United States of America*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	Case No. CR 22-00042 MMD-CLB
	)	
Plaintiff,	)	ORDER GRANTING STIPULATION
	)	AND [PROPOSED] ORDER
v.	)	REGARDING RESTITUTION
	)	
ANTHONY GEORGE MERRILL YOUNG II,	)	
	)	
Defendant.	)	

**STIPULATION**

The United States, by and through its counsel of record, and the defendant Anthony George Merrill Young II, through his counsel of record, hereby stipulate as follows:

1. On October 12, 2023, Defendant pled guilty to one count of Distribution and Receipt of Child Pornography in violation of 18 U.S.C. §§ 2252A(a)(2) and (b)(1).
2. On January 22, 2024, the Court sentenced Defendant to 60 months of imprisonment followed by 10 years of supervised release. The Court found that Defendant was indigent. Accordingly, the Court did not impose a \$5000 special assessment under the Justice for Victims of Trafficking Act. The Court instead imposed a \$100 special assessment. The Court did not impose a fine.
3. At the parties' request, the Court deferred ruling on the restitution and scheduled a hearing for April 15, 2024.
4. Victim restitution is mandatory pursuant to 18 U.S.C. § 2259. In child pornography

cases, the court shall determine the full amount of the victim's losses that were incurred or are reasonably projected to be incurred by the victim as a result of the defendant's crime, and then "order restitution in an amount that reflects the defendant's relative role in the causal process that underlies the victim's losses, but which is no less than \$3,000." 18 U.S.C. § 2259(b)(2). The court shall resolve any dispute as to the proper amount or type of restitution by a preponderance of the evidence, and the government bears the burden of demonstrating the amount of loss sustained by the victim. 18 U.S.C. § 3664(e).

5. The parties agree and stipulate that the individuals identified as victims below ("Victims") are victims of Defendant's crime of conviction.

6. The parties agree and stipulate that the Defendant shall pay restitution totaling \$33,000 to the following victims in the following amounts:

Identified Victim/Series "Name"	Restitution	Address for Payment
AprilBlonde	\$ 3,000	Restore the Child, PLLC, I/T/F April 2522 N Proctor St, Ste 85, Tacoma, WA 98406
CinderBlockBlue	\$ 3,000	Marsh Law Firm PLLC ATTN: Jane PO Box 4668 #65135 New York, NY 10163-4670
HG1	\$ 3,000	Jones Day in Trust for Lily Attn: Andrew Bjorklund 500 Grant Street, Suite 4500 Pittsburgh, PA 15219-2514
Jenny	\$ 3,000	Marsh Law Firm PLLC ATTN: Jane PO Box 4668 #65135 New York, NY 10163-4670
Lighthouse_1	\$ 3,000	Deborah A. Bianco, in trust for Maureen PO Box 6503 Bellevue, WA 98008.
MiddleModelSister	\$ 3,000	Utah Crime Victims Legal Clinic I/T/F Anna 404 East 4500 South Ste B24 Salt Lake City, UT 84107
PD11	\$ 3,000	Jones Day on Behalf of PD11 Victim c/o Allison L. McQueen and Andrew E. Lelling 110 North Wacker Drive, Suite 4800 Chicago, IL 60606

Identified Victim/Series "Name"	Restitution	Address for Payment
RedGlassesCry	\$ 3,000	Utah Crime Victims Legal Clinic I/T/F April 404 East 4500 South Ste B24 Salt Lake City, UT 84107
CinderBlockBlue	\$ 3,000	Marsh Law Firm PLLC in trust for Jane ATTN: Jane PO Box 4668 #65135 New York, NY 10163-4671
SweetWhiteSugar	\$ 3,000	Deborah A. Bianco I/T/F Pia P.O. Box 6503 Bellevue, WA 98008
TealPinkPrincess	\$ 3,000	Marsh Law Firm PLLC ATTN: Raven PO Box 4668 #65135 New York, NY 10163-4668
ZooFamily_1	\$ 3,000	Moore & Van Allen in trust for Ali Attn: Sarah Byrne/049549.1 100 N. Tryon Street, Suite 4700 Charlotte, NC 28202
<b>TOTAL</b>	<b>\$33,000.00</b>	

7. Defense counsel has discussed this stipulation with Defendant and Defendant has consented to pay restitution of \$33,000 to the victims identified above in the amounts specified.

8. The parties agree that the full amount of special assessment, fine, and restitution is due immediately in accordance with 18 U.S.C. § 3572(d) and in accordance with the parties' plea agreement.

9. The parties further agree to the following payment schedule:

- a. During imprisonment, payment of criminal monetary penalties is due at the rate of not less than \$25 per quarter and payment shall be through the Bureau of Prisons' Inmate Financial Responsibility Program.
- b. Once Defendant is on supervised release, Defendant shall pay restitution in monthly payments of not less than \$250 or at least 10% of earnings, whichever is greater, to commence no later than 60 days from placement on supervision.

10. Notwithstanding any payment schedule set by the court, the United States Attorney's Office may pursue collection through all available means in accordance with 18 U.S.C. §§ 3613 and 3664(m). The restitution payments shall be made to the Clerk of U.S. District Court, Attention: Finance

Unit, 400 S. Virginia Street, Suite 301, Reno, NV 89501.

11. The parties respectfully request that the Judgment and Sentence be modified to reflect an Order of Restitution totaling \$33,000 be paid to the Victims in the amounts specified.

12. The parties further stipulate that, in light of this agreement, the restitution hearing set for May 17, 2024, is no longer necessary. Accordingly. The parties respectfully request that the Court vacate the restitution hearing.

IT IS SO STIPULATED.

Dated: May 14, 2024

ISMAIL J. RAMSEY  
United States Attorney

/s/ Neal Hong  
NEAL C. HONG  
Assistant United States Attorney

/s/ Michael Becker  
MICHAEL BECKER  
Counsel for Defendant

**ORDER**

Based upon the facts set forth in the stipulation above, the Court hereby ORDERS that:

1. Based on the parties' stipulation, it is ordered that the Judgment and Sentence be modified to reflect an Order of Restitution as set forth below:

2. It is ordered that defendant Anthony George Merrill Young II ("Defendant") shall pay restitution in the amount of \$33,000 to the following victims in the following amounts:

Identified Victim/Series "Name"	Restitution	Address for Payment
AprilBlonde	\$ 3,000	Restore the Child, PLLC, I/T/F April 2522 N Proctor St, Ste 85, Tacoma, WA 98406
CinderBlockBlue	\$ 3,000	Marsh Law Firm PLLC ATTN: Jane PO Box 4668 #65135 New York, NY 10163-4670
HG1	\$ 3,000	Jones Day in Trust for Lily Attn: Andrew Bjorklund 500 Grant Street, Suite 4500 Pittsburgh, PA 15219-2514
Jenny	\$ 3,000	Marsh Law Firm PLLC ATTN: Jane PO Box 4668 #65135 New York, NY 10163-4670
Lighthouse_1	\$ 3,000	Deborah A. Bianco, in trust for Maureen PO Box 6503 Bellevue, WA 98008.
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Identified Victim/Series "Name"	Restitution	Address for Payment
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ZooFamily_1	\$ 3,000	Moore & Van Allen in trust for Ali Attn: Sarah Byrne/049549.1 100 N. Tryon Street, Suite 4700 Charlotte, NC 28202
TOTAL	\$33,000.00	

3. The above individuals qualify as victims pursuant to 18 U.S.C. § 2259.

4. The full amount of special assessment, fine, and restitution is due immediately. During imprisonment, payment of criminal monetary penalties is due at the rate of not less than \$25 per quarter and payment shall be through the Bureau of Prisons' Inmate Financial Responsibility Program. Once Defendant is on supervised release, Defendant shall pay restitution in monthly payments of not less than \$250 or at least 10% of earnings, whichever is greater, to commence no later than 60 days from placement on supervision.

5. Notwithstanding any payment schedule set by the court, the United States Attorney's Office may pursue collection through all available means in accordance with 18 U.S.C. §§ 3613 and 3664(m). The criminal monetary penalty payments shall be made to the Clerk of U.S. District Court, Attention: Finance Unit, 400 S. Virginia Street, Suite 301, Reno, NV 89501.

6. The Probation Office shall prepare an amended judgment in accordance with this order. The restitution hearing originally set for May 17, 2024 is hereby vacated.

IT IS SO ORDERED.

Dated: May 14, 2024



HON. MIRANDA DU  
United States District Judge